

June 30, 2017

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Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Rate Floor Certifications for 2017 Pursuant to Federal Communications
Commission Regulation 47 C.F.R. §54.313(h)
Docket No. 2013-268-C

Dear Ms. Boyd:

Federal Communications Regulation 47 C.F.R. § 54.313(h) requires certain incumbent local exchange carriers to report rate floor data by July 1 of each year. Specifically, the FCC regulation requires as follows:

- (h) *Additional voice rate data.* (1) All incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state fees as defined pursuant to § 54.318(e), to the extent the sum of those rates and fees are below the rate floor as defined in § 54.318, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

The rate floor established pursuant to § 54.318 for the period beginning July 1, 2017 (rates in effect as of June 1, 2017) is \$22.49.¹ Thus, only incumbent local

¹ See Public Notice DA 17-167 in WC Docket No. 10-90 (rel. Feb. 14, 2017); *see also* Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, *In the Matter of Connect America Fund, Universal Service Reform – Mobility Fund, ETC Annual Reports and Certifications, Establishing Just and Reasonable Rates for Local Exchange Carriers, and Developing an Unified Inter-carrier Compensation Regime*, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92, FCC 14-54 (rel. June 10, 2014), at ¶¶ 80 and 84 (The FCC waived the application of section 54.318(b) of its rules for lines reported July 1, 2017 with a rate of \$20 or above, but did not waive section 54.313(h) of the rules and, therefore, incumbent ETCs must report rates to the extent they fall below the announced urban rate floor of \$22.49); *see also* Notice of Proposed Rulemaking and Order, *In the Matter of Connect America Fund*, WC Docket No. 10-90, FCC 17-61 (Rel. May 19, 2017) (The FCC froze the minimum rate ILECs are required to charge for local telephone services to avoid losing federal high cost support at \$18 while it considers changing the current

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June 30, 2017
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exchange companies that receive high-cost support *and* have rates below the \$22.49 rate floor are required to file a report.

A copy of any required reports must be filed with the state commission. *See* 47 C.F.R. § 54.313(i). Attached please find the required information for the South Carolina Telephone Coalition companies listed in Attachment A.

The line count information reported by the companies is competitively sensitive information. Accordingly, a motion for confidential treatment accompanies this filing, and we are providing both public redacted and confidential versions of the filing.

If you should need further information, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure

cc: Jeffrey M. Nelson, Esquire, ORS
Christopher Rozycki, ORS

methodology or eliminating the rate floor requirement and its accompanying reporting obligation).

ATTACHMENT A

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2017

Bluffton Telephone Company, Inc.

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company, Inc.

Lockhart Telephone Company, d/b/a TruVista

Palmetto Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2013-268-C

Re: Rate Floor Certifications for 2017 pursuant to Federal)
Communications Commission Regulation 47 C.F.R.)
§54.313(h))
_____)

MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL

The South Carolina Telephone Coalition (see attached list of companies) (“SCTC”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Incumbent local exchange carrier Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost support are required to report all of their rates for residential local service for all portions of their service area, as well as state fees as defined in rules promulgated by the Federal Communications Commission (“FCC”), to the extent the sum of those rates and fees are below the urban rate floor established by the FCC, and the number of lines for each rate specified. The rate floor that has been established by the FCC for purposes of this report for the July 1, 2017 filing is \$ 22.49.¹ The report is required to be filed with the FCC, the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *See* 47 C.F.R. § 54.313(i).

¹ See Public Notice DA 17-167 in WC Docket No. 10-90 (rel. Feb. 14, 2017).
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information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

3. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 
M. John Bowen, Jr.
Margaret M. Fox

ATTORNEYS FOR THE SOUTH CAROLINA
TELEPHONE COALITION

Columbia, South Carolina
June 30, 2017

¹ See Public Notice DA 17-167 in WC Docket No. 10-90 (rel. Feb. 14, 2017).

ATTACHMENT A

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2017

Bluffton Telephone Company, Inc.

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company, Inc.

Lockhart Telephone Company, d/b/a TruVista

Palmetto Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Bluffton Telephone Company, Inc.
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Bluffton Telephone Company, Inc.

Signature of authorized officer

Date 6/14/17

Printed name of authorized officer Andrew Rein

Title or position of authorized officer CFO

Telephone number of authorized officer: (843) 686-1246 ext.

Study Area Code of Reporting Carrier

240512

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2017

REDACTED
RATE FLOOR DATA

Farmers Telephone Cooperative, Inc.

Rate Floor Certification and Data

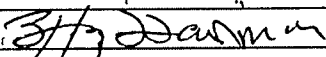
Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Farmers Telephone Cooperative, Inc.

Signature of authorized officer



Date June 9, 2017

Printed name of authorized officer Jeffrey L. Lawrimore

Title or position of authorized officer Chief Financial Officer

Telephone number of authorized officer: (843) 382-1381 ext.

Study Area Code of Reporting Carrier

240520

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2017

REDACTED
RATE FLOOR DATA

Hargray Telephone Company, Inc.
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

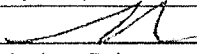
Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Hargray Telephone Company, Inc.

Signature of authorized officer



Date

6/14/17

Printed name of authorized officer Andrew Rein

Title or position of authorized officer

CFO

Telephone number of authorized officer: (843) 686-1246 ext.

Study Area Code of Reporting Carrier

240523

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2017

REDACTED
RATE FLOOR DATA

Lockhart Telephone Company, d/b/a TruVista

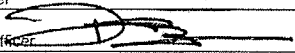
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier				LOCKHART TELEPHONE COMPANY	
Signature of authorized officer					
Date			6-9-17		
Printed name of authorized officer				DAVID H. BRUNT	
Title or position of authorized officer				EXECUTIVE VP ADMINISTRATION & CFO	
Telephone number of authorized officer:				(803) 581-9195 ext.	
Study Area Code of Reporting Carrier		240532		Filing Due Date for this form (mm/dd/yyyy)	
				07/01/2017	

REDACTED
RATE FLOOR DATA

Palmetto Rural Telephone Cooperative, Inc.

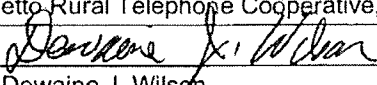
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier: Palmetto Rural Telephone Cooperative, Inc.			
Signature of authorized officer: 			Date: 6/1/2017
Printed name of authorized officer: Dewaine J. Wilson			
Title or position of authorized officer: Chief Executive Officer			
Telephone number of authorized officer: (843) 538-9090 ext.			
Study Area Code of Reporting Carrier	240536	Filing Due Date for this form (mm/dd/yyyy)	07/01/2017

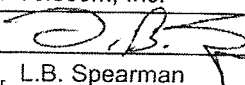
REDACTED
RATE FLOOR DATA

PBT Telecom, d/b/a Comporium
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier PBT Telecom, Inc.				
Signature of authorized officer 			Date 6-6-2017	
Printed name of authorized officer L.B. Spearman				
Title or position of authorized officer Vice President				
Telephone number of authorized officer: (803) 210-5528, ext.				
Study Area Code of Reporting Carrier	240539		Filing Due Date for this form (mm/dd/yyyy)	07/01/2017

REDACTED
RATE FLOOR DATA